

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NATIONAL COALITION ON
BLACK CIVIC PARTICIPATION,
MARY WINTER, GENE
STEINBERG, NANCY HART,
SARAH WOLFF, KAREN SLAVEN,
KATE KENNEDY, EDA DANIEL, and
ANDREA SFERES,

Plaintiffs,

-and-

People of the STATE OF NEW
YORK, by its attorney general,
LETITIA JAMES, ATTORNEY
GENERAL OF THE STATE OF
NEW YORK

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN,
J.M. BURKMAN & ASSOCIATES,
LLC, PROJECT 1599, MESSAGE
COMMUNICATIONS, INC., and
ROBERT MAHANIAN,

Defendants.

Civil Action No. 20-cv-08668-VM-OTW

**NOTICE OF MOTION AND
MOTION FOR WITHDRAWAL OF
APPEARANCE**

PLEASE TAKE NOTICE that, pursuant to Rule 1.4 of the Local Rules for the United States District Courts for the Southern and Eastern Districts of New York, I, Randy E. Kleinman, a partner with the law firm of Gerstman Schwartz LLP, hereby respectfully requests that I be relieved as counsel for Defendants Jacob Wohl, Jack Burkman, J.M. Burkman & Associates LLC, and Project 1599 (the “Defendants”). I am no longer affiliated with Gerstman Schwartz LLP who will continue to represent Defendants.

Dated: January 26, 2023

KLEINMAN GINZBERG LLP

By: /s/ Randy E. Kleinman

Randy E. Kleinman

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Carle Place, New York 11514

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Attorneys for Defendants

SO ORDERED:

Dated _____, 2023

CERTIFICATE OF SERVICE

I hereby certify on this 26th day of January, 2023, a copy of the foregoing Motion of Withdrawal of Randy E. Kleinman as Counsel for Defendants was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Randy E. Kleinman

Randy E. Kleinman

Counsel for Defendants